

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

|                  |   |                           |
|------------------|---|---------------------------|
| ZHENGJIA ZHANG,  | : |                           |
|                  | : |                           |
| Plaintiff,       | : |                           |
|                  | : |                           |
| v.               | : | CASE NO. 2:23-CV-02658-WB |
|                  | : |                           |
| CSL BEHRING LLC, | : |                           |
|                  | : |                           |
| Defendant.       | : |                           |
|                  | : |                           |

**DEFENDANT CSL BEHRING LLC’S  
MOTION TO DISMISS PLAINTIFF’S FIRST AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendant CSL Behring LLC hereby moves this Court to dismiss Plaintiff’s First Amended Complaint (ECF No. 16), which purports to state a claim of breach of contract, breach of implied-in-fact contract, promissory estoppel/detrimental reliance, and unjust enrichment. CSL Behring LLC relies upon the attached Memorandum of Law in support of its Motion.

Dated: October 19, 2023

Respectfully submitted,

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